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Of Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

ANTHONY CROSS,

3:14-cv-01310-KI

PLAINTIFF,

v.

**DEFENDANTS' PROPOSED CASE
SCHEDULE**

CITY OF PORTLAND, a public body,
CHARLES ASHEIM, in his individual
capacity, **JAMES DEFRAIN**, in his
individual capacity, **CHRISTOPHER
BURLEY**, in his individual capacity,
PATRICK MURPHY, in his individual
capacity, **BRIAN DALE**, in his individual
capacity, and **KEN DUILIO**, in his individual
capacity,

DEFENDANTS.

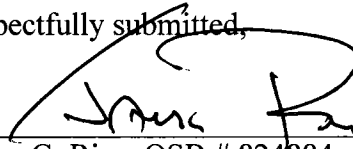
In response to the Court's Order, Docket No. 39, counsel for Defendants have attempted to communicate with Plaintiff's attorney by both email and U.S. Mail in order to confer on a new case schedule. Defendants proposed the new schedule set forth below to Plaintiff and have not received a response:

Discovery cut-off: 15 October 2015
Dispositive motions, if any: 15 November 2015
Expert reports due: 15 December 2015

While Plaintiff has not approved this schedule, Defendants are filing it with the Court in order to comply with the Court's Order (Docket No. 39). However, Defendants find it difficult to propose new dates to the Court at this point in time. Defendants filed a Motion to Compel and Declaration in Support (Docket No.'s 40-41) on June 19, 2015, because Plaintiff did not provide any discovery in response to a basic Request for Production in violation of the Court's Order (Docket No. 26). This proposed new schedule does not account for any other difficulties Defendants may encounter during the discovery period.

Dated: June 30, 2015

Respectfully submitted,



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